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STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
P.O. BOX 30028  
LANSING, MI 48909

DAVID F. HALES, Director

U.S. EPA RECORDS CENTER REGION 5



503886

January 16, 1990

Mr. William Messenger, Chief  
Pre-Remedial Unit (5HSM-12)  
Technical Support Section  
U.S. EPA-Region V  
230 S. Dearborn St.  
Chicago, IL 60604

Dear Mr. Messenger:

Thank you for the opportunity to comment on the draft screening site inspection report by Ecology & Environment for the Ren Plastics (MID005319603), site on Cedar St. in Lansing, Ingham County, Michigan.

Ren Plastics-Cedar St., Ingham Co.-

To begin, I concur with this site being given NFRAP (No Further Remedial Action Planned) status, reflecting the cleanup activities carried out under state auspices. My objections concern both the level of work carried out by E&E during the screening site inspection and the quality of the assessment of the site. To summarize, this site should have been given NFRAP status before the screening site inspection was performed.

In its February 1986 report, Snell Environmental Group stated that 280 cubic yards of contaminated soil, 700 gallons of septic tank liquid and 3,000 pounds of septic tank sludge were removed to a hazardous waste landfill. In addition, a concrete pad and fencing were removed to a solid waste landfill. These removal actions were performed in accordance with a MDNR approved work plan. Groundwater samples from MW2 and MW5 (temporary monitor wells in place prior to the soil removal), collected on January 30, 1984, failed to detect compounds on MDNR Environmental Lab Scan 1 & 2 (purgeable halocarbons and purgeable aromatics). No follow up soil or groundwater samples were collected by MDNR or private contractors. E&E is basing its recommendation for giving the site NFRAP status on these removal actions. If E&E is basing its recommendations on these actions rather than on confirmation samples collected during a screening site inspection, why bother to do a screening site inspection at all?

E&E states in its report that no soil samples were collected during the screening site inspection because the area where the soil removal occurred at the western end of the plant building is now covered by the expansion of the building by its present occupants (see Fig. 3-1, Site Features). No soil samples were collected from the area where the septic tank and drain field were located (between the east end of the building and Cedar St.). The only work

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performed by E&E during the site inspection consisted of an interview with the current building's occupants and the taking of a few photographs of the building and the surrounding property.

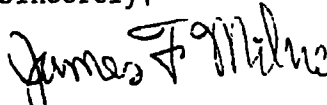
This level of effort by E&E is a waste of EPA pre-remedial grant money. No soil samples were collected to determine whether any soil contamination remained at the site. Contacts with MDNR staff, the current site owners, or a pre-site inspection visit by one E&E staff person could have determined that no viable soil sample locations remained accessible. This site should have been given NFRAP status during the development and review of the site inspection work plan.

The HRS scoring of this site and the assessment of contaminant migration potential also are in error. The toxicity score might be based on the presence of PCBs in pre-removal soil samples and the soil binding capacity of PCBs but there is no information in MDNR files to support the using of heavy metals for toxicity scoring. The likelihood of PCBs to migrate downward 70 plus feet to the Saginaw Formation sandstone (the aquifer of concern) is minimal, given the clay content of the glacial till as well as the presence (even if discontinuous) of discrete clay and shale units. The well log closest to the site indicates that clay layers five and 25 feet thick and a seven foot thick shale layer are present above the sandstone aquifer. PCBs tend to be bound to clay particles and organic material in soil.

Although the report mentions that storm drains are likely to catch any surface runoff from the site, the potential for contaminants to migrate overland to Sycamore Creek is mentioned in the report. Sycamore Creek is over one mile east of the site. In addition, this site is located in an urban area with elevated street (Cedar St.) and railroad (Penn Central) grades located between the site and Sycamore Creek (see site photos, Appendix E, and the four mile radius map, Appendix A).

If you have any questions regarding these comments please contact me at the number listed below.

Sincerely,



James F. Milne  
Pre-Remedial Program  
Superfund Section  
ENVIRONMENTAL RESPONSE DIVISION  
517-373-4809

cc: Mr. George Carpenter, MDNR  
Ms. Jean Haight, MDNR  
Act 307 Section Files